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August 9, 2023

## BY ECF

Hon. Jesse M. Furman United States District Judge U.S. Courthouse, 40 Foley Square New York, New York 10007

Re: Accent Delight Int'l Ltd. v. Sotheby's et al., No. 18 Civ. 9011

## Dear Judge Furman:

The parties jointly request an extension of the opposition deadline for the motions *in limine*. The motions are due on August 31, 2023. Currently, under Rules 6.B and 6.F of Your Honor's Individual Rules and Practices in Civil Cases, oppositions to the motions are due 7 days later, on September 7, 2023. Plaintiff and Defendants each anticipate filing motions *in limine* regarding multiple factually and legally complex issues. As such, the parties anticipate needing additional time to prepare their oppositions. For the same reason, the parties also request leave to file replies in support of their motions *in limine*, and an extension of the default deadline under Local Rule 6.1(b) of 7 days for replies. The parties are not requesting a change of the initial date of August 31 for motions *in limine* to be filed.

Therefore, we ask the Court to order the following briefing schedule:

August 31, 2023 – parties file motions *in limine* October 5, 2023 – parties file oppositions to motions *in limine* October 26, 2023 – parties file replies in support of motions *in limine* 

This is the first request for an extension of the opposition deadline for motions *in limine*. Although the parties have previously requested—and the Court has granted—two extensions of the August 31 deadline for the joint pretrial order and required pretrial filings, that deadline would not be affected by the requested extension of the motion *in limine* briefing schedule for oppositions (and, if allowed, replies).

## Case 1:18-cv-09011-JMF Document 546 Filed 08/09/23 Page 2 of 2

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP Page 2

We also request an enlargement of the default page limit for all memoranda of law for the motions *in limine*, also due to the expected factual and legal complexity of the parties' motions. We request an enlargement from 25 to **35 pages for the opening and opposition memoranda of law** and an enlargement from 10 to **15 pages for the reply memoranda of law**, should the Court grant our request to submit replies.

Respectfully,

/s/ Daniel J. Kornstein Attorney for Plaintiff

cc: All counsel of Record (via ECF)